

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SECOND AMENDMENT FOUNDATION,
et al.,

Plaintiffs,

v.

BUREAU OF ALCOHOL, TOBACCO,
FIREARMS, AND EXPLOSIVES, *et al.*,

Defendants.

No. 3:21-cv-0116-B

DEFENDANTS' CONSENT MOTION FOR LEAVE TO FILE OVERSIZED BRIEF

Defendants respectfully request this Court's permission to file an oversized brief in opposition to Plaintiffs' motion for preliminary relief, ECF Nos. 51, 52, allowing for a 15-page enlargement of the 25-page limit under Local Rule 7.2(c).

Plaintiffs filed their motion on March 3, 2023. *See* ECF No. 51. Defendants' opposition brief is due March 24, 2023. *See* ECF No. 49. Given the number and complexity of the issues presented by Plaintiffs' motion, Defendants submit that the standard 25-page response provided under the Local Rules is insufficient to fully address the issues before the Court.

Therefore, Defendants request that the page limit for their forthcoming opposition brief be enlarged by 15 additional pages, such that their brief shall not exceed 40 pages. Defendants further request that the page limit for Plaintiffs' reply brief be enlarged by the same number of pages, such that their brief shall not exceed 25 pages. *See* L.R. 7.2(c). Defendants conferred with Plaintiffs, and Plaintiffs consent to the requested relief.

Defendants appreciate the Court's consideration and respectfully request entry of their proposed order.

Dated: March 23, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

BRIGHAM J. BOWEN
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/s/ Jody D. Lowenstein
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CERTIFICATE OF CONFERENCE

The parties conferred, and Plaintiffs consent to the relief requested herein.

/s/ Jody D. Lowenstein
JODY D. LOWENSTEIN
Trial Attorney
U.S. Department of Justice

CERTIFICATE OF SERVICE

On March 23, 2023, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the Court's electronic case filing system. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Jody D. Lowenstein
JODY D. LOWENSTEIN
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